

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

EXHIBIT 19

ANGELA RUSSELL, AS ADMINISTRATRIX  
OF THE ESTATE OF JEREMY T. RUSSELL  
AND ON BEHALF OF THE WRONGFUL DEATH  
BENEFICIARIES OF JEREMY T. RUSSELL,

PLAINTIFF,

V.

CASE NO.3:22-cv-294-HTW-LGI

MANAGEMENT & TRAINING CORPORATION; et al.,  
DEFENDANTS.

\*\*\*\*\*  
DEPOSITION OF MARK WEBB, M.D.  
\*\*\*\*\*

Taken at the office of Dr. Mark Webb  
576 Highland Colony Parkway  
Ridgeland, Mississippi,  
on Tuesday, July 18, 2023,  
beginning at approximately 1:00 p.m.

\*\*\*\*\*

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John and Jane Doe Correctional Officers:

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1 the speed of the boxes at the pizza place and  
2 that he was working in his mother's -- hotel his  
3 mother worked at. But, hey, that's a good start.  
4 And I've got other schizophrenic patients and  
5 drug-addict patients who are able to work some.  
6 So that sort of fits.

7 Q You say, "After being reincarcerated in  
8 2021 he talked to MDOC Mental Health --" that  
9 would be medical people "-- about hearing voices  
10 and having suicidal thoughts."

11 And were those in the context of  
12 situations where he reported using drugs?

13 A Uncertain. Uncertain.

14 Q You don't know that?

15 A I don't.

16 Q You can't, as you sit here today, you  
17 can't point to any place in the record where he  
18 did that outside the context of admittedly using  
19 drugs?

20 A Whether that's true or not also. Yeah,  
21 I couldn't -- I would have to spend some time and  
22 look. Those are good questions. Again, as Ms.  
23 Dunn talked about, he's a poor historian. So  
24 every time he admits to something, we're not  
25 quite so sure. I mean, we could take it at face

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1 value if we want, but I wouldn't.

2 Q All right. So it says in June 2021,  
3 Mr. Russell was sent to the local hospital due to  
4 an altered mental status and confusion. Now,  
5 that was, again, drug use, correct, according to  
6 the records?

7 A Allegedly, again, allegedly if the  
8 statements were true, I think drug use was, to  
9 use your words, were amiss/around. I'm not sure  
10 if it's the cause or the result.

11 Q All right. Do you recall whether in  
12 that circumstance the hospital, the local  
13 hospital actually diagnosed him as a drug  
14 overdose or drug use?

15 A Those words are mentioned. Again, I  
16 would want to know where they got that history  
17 from. Is it from him? Is it from drug test,  
18 etcetera.

19 Q Then you say, "He was again  
20 unresponsive in July 2021." And in that case  
21 again, it was not again self-reported drug use?

22 A Allegedly drug use, yes.

23 Q And you say, "In September '21 he was  
24 found to have psychosis along with  
25 schizophrenia." And I think you mentioned Dr.

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1 photograph was taken from?

2 A Either inside of the -- I think it's  
3 inside of cell looking out or inside of the tower  
4 room looking out. I think it's inside of the --  
5 I'm not sure exactly which one it is.

6 Q I will represent to you, and I'm sure  
7 Grafton won't have any problem, that this was  
8 taken inside of Jeremy Russell's cell facing as  
9 far as toward the control tower unit as you can  
10 see.

11 A Got you. That was my first thought,  
12 yes.

13 Q Okay. And this goes to questions  
14 earlier in the report, but I will skip over to  
15 the last paragraph of Page 5.

16 A Yes.

17 Q And specifically the last sentence  
18 said, "Had the camp support control room been  
19 manned as required by MTC, Mr. Russell would  
20 have, more likely than not, refrained from  
21 attempting completing the act of suicide."

22 How does that opinion flesh with  
23 looking at this photograph?

24 A That hearing from Mr. Green and Mr.  
25 Hunter what's usual and customary is that they

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1 talk about who's in there or not in there, that  
2 he would have known -- that he would have had  
3 knowledge that there was nobody there and would  
4 have been unimpeded with the suicide attempt.

5 But do I have the specifics that  
6 anybody told Mr. Russell? I do not, but we heard  
7 from the depositions what is usual and customary.

8 Q But neither of those inmates testified  
9 that they specifically told Mr. Russell that the  
10 control unit was unmanned the morning of  
11 October 7, 2021?

12 A Neither one of them told Mr. Russell.  
13 Is that what you're asking?

14 Q Correct.

15 A Correct. I mean, the expert report  
16 says it was unmanned. I don't know if they  
17 specifically told Mr. Russell.

18 Q Okay. And since it's part of your  
19 opinion, wouldn't you agree it would be very hard  
20 to see inside that control unit from Mr.  
21 Russell's cell that he was in on October 7, 2021?

22 A Yes, that would be hard. I was relying  
23 on the information from Mr. Green and Mr. Hunter  
24 that they would talk.

25 Q They would talk?

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1           A     No. That's VitalCore.

2           Q     In the last paragraph, obviously it is  
3 directed to MTC.

4           A     Sure.

5           Q     The first sentence talks about the camp  
6 support unit not being observed at the time Mr.  
7 Russell placed the ligature around his neck. And  
8 then it says, "And there is significant evidence  
9 that Jeremy knew this." Can you tell me what the  
10 significant evidence is that you have to support  
11 that statement is?

12          A     Just from the depositions and what I  
13 read, it was the usual and customary situation in  
14 that inmates talk.

15          Q     Nothing else, though?

16          A     Nothing else. And just my time in  
17 correctional systems and that inmates know a lot  
18 of what's going on.

19          Q     Right. The next sentence says, "This  
20 is because at least some of the inmates in camp  
21 support can see inside the control room. And  
22 every time security was absent, inmates would  
23 talk about the fact security was not there."  
24 Nobody testified that every time they talked  
25 about that, did they?

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1 MR. BRAGG: Objection.

2 THE WITNESS: That's true.

3 BY MR. GARNER:

4 Q And the last sentence of that last  
5 paragraph on Page 5 says, -- I guess ultimately  
6 your conclusion here, "Had the camp support  
7 control room been manned as required by MTC and  
8 MDOC, Mr. Russell would have more likely than not  
9 refrained from attempting and completing the act  
10 of suicide." Tell me basis of your opinion on  
11 that as to that sentence.

12 A That Mr. Russell, if you take  
13 everything that he says into account about what  
14 his mother said that he was suicidal that day,  
15 the day before, he had recent suicide issues,  
16 just got off suicide watch, he was in s single  
17 cell with a bedsheet, with property, was banging  
18 on the door allegedly saying he was suicidal.  
19 Taking all that into account, if all that is  
20 true, that he was a set-up for suicide. But he's  
21 been stopped before by MTC and VitalCore for  
22 years because somebody else was around. This  
23 time there was nobody around, and he was not  
24 stopped.

25 Q Is it your opinion that the mere



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1 presence of someone in that control unit would  
2 have prevented Jeremy Russell from taking his  
3 life on the day of October 7, 2021?

4 A It's less likely -- yes. It's less  
5 likely that he would have killed himself if he  
6 knew he was going to be interrupted, or attempt  
7 to kill himself if he knew he was going to be  
8 interrupted.

9 Q How long does -- when someone makes the  
10 decision -- in your professional opinion, having  
11 dealt with suicidal patients before, how long  
12 does it take someone to complete the act of  
13 hanging themselves?

14 A Not very long.

15 Q And, again, you can't tell me how often  
16 an officer should or shouldn't have been in that  
17 dayroom at any given time in that camp support  
18 unit, correct?

19 A Correct. I don't know the dayroom  
20 policy, correct.

21 Q Okay. On your conclusions on Page 6,  
22 that first paragraph under conclusions, that's  
23 not related to MTC, correct?

24 A Doesn't appear, no.

25 Q And the same thing with regard to the

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1 that.

2 Q Upwards of how long might it take an  
3 unperfect or imperfect hanging?

4 A Well, they could survive it. Or, you  
5 know, you read about people being seen and pulled  
6 down. I guess -- I don't know. I don't know.  
7 But all the way from 13 seconds to they survive,  
8 however length what time that is.

9 Q Yeah. And there's no way to know --  
10 and it sounds morbid to talk about the perfect  
11 hanging or perfect suicide, I understand.

12 A Right.

13 Q I'm not trying to be insensitive to  
14 anybody about that.

15 A Right.

16 Q But whether this was perfect or not, it  
17 did have the desired end result if that's what  
18 Jeremy Russell was trying to do, correct?

19 A That's true.

20 Q Okay.

21 A Yeah, Opinion 3, I would agree with  
22 that. You know, were the drugs part of the --  
23 the illicit drugs part of the suicide or not.  
24 It's could be the psychiatric illness. Lots of  
25 schizophrenics kill themselves. Lots of drug

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1     addicts kill themselves. So it's hard to know.

2           Q     So it would be impossible to give an  
3     opinion on that to a reasonable degree of medical  
4     certainty?

5           A     To a reasonable degree of medical  
6     certainty, it's probably a little combination of  
7     both. And I wouldn't know about the rates of  
8     pay.

9           Q     Yeah.

10           MR. GARNER: That's all I have.

11                         FURTHER EXAMINATION

12           BY MR. CHASE:

13           Q     I have just a few more questions to  
14     follow up. Some things that Mr. Garner said  
15     prompted me to consult my notes again.

16           A     Sure.

17           Q     I noted that you said that one of the  
18     things you relied on in your supplemental report  
19     was the contract between VitalCore and MDOC. And  
20     if you would, tell me what in that contract  
21     impacted your opinion and how.

22           A     Just trying to understand where one  
23     began and one ended. I'm not saying that I  
24     completely understood it, but that was trying to  
25     figure out, like they were talking about, you